



Safeguarding and Welfare

Policies and Procedures for Safeguarding Children and Vulnerable Adults

Accredited by the
 **BRITISH
COUNCIL**
for the teaching
of English in the UK



TRINITY
COLLEGE LONDON
Registered Examination Centre 46190

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Summary

Aim	<p>At Burlington School the welfare of our students is paramount. The following policy aims:</p> <ul style="list-style-type: none"> • to ensure that all students aged under 18, and all students classed as “vulnerable”, are protected from potential abuse by staff, representatives, sub-contractors and fellow students of Burlington School; • to inform Burlington School staff, representatives and sub-contractors of their responsibilities when working with children and vulnerable adults; • to highlight our commitment to safe recruitment, selection and vetting of staff, accommodation providers and other suppliers; • to ensure that all staff, representatives and sub-contractors are aware if any student is under 18 and that they are also aware of any consequent special procedure(s) which are applicable; • to ensure that all relevant staff, representatives and sub-contractors are aware of any students classed as “vulnerable”, and aware of any consequent special procedure(s) which are applicable.
Applies to	<ul style="list-style-type: none"> • School Management • Academic Management • Student Support staff • Marketing and Sales staff • Accommodation staff • Teaching staff • Activity Leaders • Homestay providers • Residence managers & staff • External tour operators • Taxi firms • Partner institutions • Safeguarding & Welfare Officer
Approved by	Deputy Principal
Responsibility for update	Designated Safeguarding Leads Safeguarding & Welfare Officer
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Proposed date of review	November 2020

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Introduction

This Policy aims to follow relevant legislation and guidelines, including:

- The Education Act (2002) Section 175ⁱ
- The Children Act (1989 and amendments)ⁱⁱ
- The Children Act (2004)ⁱⁱⁱ
- Working Together to Safeguard Children (2015)^{iv}
- Safeguarding of Vulnerable Groups Guidance (2006)^v
- Safeguarding of Vulnerable Adult Schemes
- Aimsafer: A Framework for Safeguarding Children & Young People in Higher Education Institutions
- Data Protection Act (1988)^{vi}

The Children Act 1989 states the legal definition of a child is 'a person under the age of 18'.

Section 115(4) of the Police Act (1997)^{vii} states that a person can be considered to be vulnerable if they are "substantially dependent upon others in performing basic physical functions, or his ability to communicate with those providing services, or to communicate with others, is severely impaired, and, as a result, he would be incapable of protecting himself from assault or other physical abuse, or there is a potential danger that his will or moral well-being may be subverted or overpowered".

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Our Principles

We believe all students have the right to a safe and secure learning experience. Our principles are as follows:

- The welfare of under-18s and vulnerable adults is central at Burlington School. All under-18s and vulnerable adults have the right to safeguarding from abuse, regardless of their age, gender, disability, racial origin, religious beliefs, sexuality, language, socio-economic status or appearance.
- It is the responsibility of all staff, students and representatives of Burlington School to report any concerns about welfare to the Safeguarding & Welfare Officer immediately. The Safeguarding & Welfare Officer will deal with the concern following the procedures documented in this policy.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
- All personal data will be processed in accordance with the requirements of the Data Protection Act 1998, and with the General Data Protection Regulation (GDPR), May 2018
- Burlington School will foster a culture where safeguarding is taken seriously through regular staff training and commitment to safeguarding procedures.
- Burlington School will work in connection with the appropriate Local Safeguarding Children Board, and the Police and Social Services where necessary, regarding any issues relating to safeguarding (see [Appendix 8](#) for details of the appropriate Local Safeguarding Children Boards).
- Burlington School's policies and related rules are based on local knowledge, of laws, customs and safety. Although The School is aware that practices may differ in other countries, concessions will not be made, and policies will be adhered to, and rules enforced, for all students.

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Definition of abuse

Abuse is the physical, sexual or emotional mistreatment, or neglect of a person, which either deliberately or unknowingly causes harm, threatens the life or violates their rights.

There are four main types of abuse that everybody should be aware of:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

This list is not extensive and sometimes there is a mixture of two or more forms of abuse at any time. It is important that each person familiarises themselves with signs of abuse to help combat it. For this and a more in depth description of the points listed above, see [Appendix 2](#).

Other common types of abuse include:

- Psychological – repeatedly being made to feel unhappy, humiliated, afraid or devalued by others
- Financial or material – stealing or denying access to money or possessions
- Discriminatory – abuse motivated by discriminatory attitudes towards race, religion, gender, disability or cultural background

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Issues of High Risk in an International Environment

Due to the International nature of students at Burlington School, a number of additional areas are focussed on:

1. Preventing radicalisation and extremism

Section 26 of the Counter-Terrorism and Security Act 2015^{viii} places a duty on certain bodies in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. The Prevent Duty (originally the Prevent Strategy)^{ix} was published by the Government in 2011 as part of the overall counter-terrorism strategy, CONTEST^x.

The Prevent Duty has three specific strategic objectives:

- to respond to the ideological challenge of terrorism and the threat we face from those who promote it;
- to prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support;
- to work with sectors and institutions where there are risks of radicalisation that need to be addressed.^{xi}

Burlington School understands its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations in the ways shown below.

See [Appendix 7](#) for more information on The School’s Prevent Duty Statement of Aspiration.

See the [Burlington School Prevent Duty Policy](#) for further information.

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2. Child sex exploitation

The UK Government has written advice and guidance on Child Sexual Exploitation that states^{xii}:

“Sexual exploitation ... involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive ‘something’ (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money, mobile phones) as a result of their performing, and/or another or others performing on them, sexual activities. It can occur through the use of technology without the child’s immediate recognition; e.g. being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child’s limited availability of choice resulting from their social/economic and/or emotional vulnerability.”

Child Sexual Exploitation should be regarded as a form of abuse, and should be monitored and reported as outlined elsewhere in this document (see [Reporting and Monitoring Procedures](#) and [Appendix 3: Appropriate Responses and Actions](#) for further information).

Any child or young person can be a victim of sexual exploitation, but children are believed to be at greater risk of being sexually exploited if they:

- are homeless
- have feelings of low self-esteem
- have had a recent bereavement or loss
- are in care
- are a young carer

Signs of child sexual exploitation include the child or young person:

- going missing for periods of time or regularly returning home late
- skipping school or being disruptive in class
- appearing with unexplained gifts or possessions that can’t be accounted for
- experiencing health problems that may indicate a sexually transmitted infection
- having mood swings and changes in temperament
- using drugs and/or alcohol
- displaying inappropriate sexualised behaviour, such as over-familiarity with strangers, dressing in a sexualised manner or sending sexualised images by mobile phone ("sexting")
- they may also show signs of unexplained physical harm, such as bruising and cigarette burns

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3. Female genital mutilation (FGM)

The UK Government has written advice and guidance on FGM that states^{xiii}:

“FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practiced on a child, it is a violation of the child’s right to life, their right to their bodily integrity, as well as their right to health. The UK Government has signed a number of international human rights laws against FGM, including the Convention on the Rights of the Child. Girls are at particular risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they may be at risk of undergoing FGM.

[Nationalities] that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However, women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women.”

Signs that a child may be at risk of FGM:

- In conversation a child may talk about FGM.
- A child may express anxiety about a special ceremony.
- The child may talk or have anxieties about forthcoming holidays to their country of origin.
- A parent or guardian requests permission for extended authorised absence for overseas travel.

Burlington School of English has a strictly-enforced attendance policy that does not authorise extended holidays.

If a member of staff believes that a child is at risk of FGM, they must inform the Safeguarding Lead, who will pass the matter on to the local Safeguarding Board.

If it comes to the attention of a staff member that a student has already undergone FGM, consideration needs to be given to any Child Protection implications for younger siblings or extended family members, and they must inform the Safeguarding Lead, who will pass the matter on to the local Safeguarding Board.

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Responsibilities of Burlington School Staff and Representatives

The Deputy Principal has responsibility for the oversight of the College's Safeguarding Children and Vulnerable Adults Policy with delegated responsibility to relevant members of the Management Team. The Safeguarding & Welfare Officer is responsible for the implementation of the policy, and will liaise directly with the Deputy Principal as deemed necessary.

To ensure the welfare policy is implemented and that we are aware of all under-18s and vulnerable adults at Burlington School, different departments are required to follow guidelines specific to their job role

I. Registration and Administration of students

- Burlington School requires all personal details from students on initial registration to The School to offer the opportunity for the student, parents/guardian or agent to tell us of any medical conditions or educational needs. Arrangements will be made for the appropriate requirements of each individual student.
- Full next of kin details for all students are required prior to arrival in case of any emergency.
- All parents/guardians of any under-18s coming to The School must complete, sign and return a parental consent form, which is sent out when the booking is received.
- Teachers will be told in advance if any special requirements are needed for vulnerable adults in their classes.
- Appropriate training is provided to all relevant staff prior to the arrival of students who are classed as vulnerable.
- A meeting is arranged between each student and the Safeguarding & Welfare Officer during the student's first week, to check on their welfare, and to discuss the assistance available to them.
- All students must be made aware of the 24-hour emergency phone numbers for welfare and accommodation, and must be made to feel happy to call these numbers at any time (they are listed in the student handbook).

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II. General staff responsibilities

- **All** staff members have a responsibility for safeguarding under-18s and vulnerable adults.
- Upon acceptance of employment every staff member will have an enhanced DBS check. Employment is conditional on a person having no criminal convictions; this is inclusive of any

cautions, reprimands or final warnings. Employees must report any subsequent criminal convictions to the Principal immediately. Failure to do so will result in disciplinary action being taken.

- Within one week of acceptance of employment all employees are expected to complete the E-Learning Introductory Safeguarding Training which can be found at the following address: <http://www.safeguardingchildren.co.uk/e-learning-course.html>
- Teachers are asked to report any absences of under-18s or vulnerable adults to the Safeguarding & Welfare Officer and Director of Studies 10 minutes after the start of the lesson, who will then follow the Attendance Policy procedures.
- The Social Programme Organiser will ensure all appropriate Health and Safety risk assessments have been conducted for any trips available to students under 18 or vulnerable adults. A copy of these documents is stored in the welfare folder.
- The Social Programme Organiser will check that all under-18s have the relevant signed parental consent before they book trips with our representative tour companies, or before they arrange activities independently [consent for such activities is obtained through the parental consent form, which is sent out when the booking is received].
- The Social Programme Organiser must ensure that under-18s adhere to any curfews, do not drink alcohol and are protected from potential harm.

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III. Visitors to The School

- All visitors must report to reception when they enter The School. If they need to enter another part of The School they will be escorted by a member of Management or administrative staff.

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IV. Accommodation

- Students under 18 will not be accommodated with students 18 years and above.
- All agencies must have satisfactory safeguarding policies and practices in place, including the use of DBS checks for homestay providers.
- All homestays are revisited in accordance with British Council requirements (at least every year) to ensure standards are maintained.
- Homestay accommodation that is alleged to fall below the British Council required standard, or to fail to adhere to Burlington School policies, will be reported to the relevant homestay agency, and “blacklisted” by Burlington School.
- All complaints relating to homestay are investigated immediately. In the case of a serious complaint, or if information is passed to The School giving cause for concern, it will be reported to the relevant authorities immediately.
- For students aged 18 and above who are staying in Residential accommodation, the residence must have satisfactory safeguarding policies and practices in place.

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V. Representatives of Burlington School

- Any tour operators working with Burlington School must have a satisfactory safeguarding policy in place. A copy of any legal documents will be kept at in the Safeguarding file.
- All students under 18 who wish to take part in any tour or activity arranged by our representatives must have the appropriate signed consent [consent for such activities is obtained through the parental consent form, which is sent out when the booking is received].
- Burlington School works with one company to arrange transfers to and from airports on arrival and departure of students; drivers are required to have a DBS check.
- Any under-18s who require a transfer must have signed consent from their parents [consent for this is obtained through the parental consent form, which is sent out when the booking is received].

- If students under 18 are travelling as unaccompanied minors (i.e. without a parent or guardian), The School is informed in advance. In such cases, appropriate supervision is arranged.

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VI. Students of Burlington School:

The primary objective of what The School does is to protect the students; however, the promotion of a safe and caring environment is intended to lessen the likelihood of peer abuse.

- Prior to arrival, all students are sent a welcome pack giving information about the school and life in London and the UK
- During induction, and in the Student Handbook, students are told about our welfare procedures, and given contact details for Safeguarding staff and external agencies.
- Students under 18 are highlighted on registers, and wear lanyards stating they are under 18. Their age is also highlighted on class registers.
- Students under 16 are not normally placed in classes, and do not normally share activities with, students aged 18 and above.
- Posters are on display throughout the school giving information about the UK and London, and highlighting the Core British Values.
- Posters are on display throughout the school and in all classrooms giving the contact details of Safeguarding staff, and reminding them of the procedures The School has in place.

Interaction with Students

Staff should aim to protect both themselves and students by:

- remaining professional at all times
- avoiding situations where students can feel intimidated
- avoiding situations where people's suspicions might be aroused
- avoiding being alone and unsupervised with students under the age of 18
- avoiding physical contact with all students

Social Media

- Staff are strongly discouraged from engaging on social media with current students.
- It is good practice to maintain separate professional and personal profiles.
- Communication should ideally be carried out through the school rather than personally.
- Engaging on social media with students under the age of 18 is against company policy, and any breaches will be regarded as gross misconduct.

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Recruitment

1. Advertising:

All job advertisements must state the following:

- employees are expected to share The School's commitment to safeguarding and promoting the welfare of its students.
- employees must be aware of their responsibilities under legislation regarding Safeguarding, Health and Safety, and the Prevent Duty.
- Burlington School is an equal opportunity employer, and must include The School's Statement of Purpose.

See [Appendix 9](#) for a sample job advertisement.

2. Interview:

Invitations to interviews must inform the candidate that The School will ask the candidate to either produce a link to their record on the DBS update service, or to undergo an enhanced DBS check; they will also be informed that The School will ask them to produce Police Checks from all countries that they have been resident in for the last 5 years. Candidates will also be asked to produce photographic evidence of their identity, such as a passport or EU/EEA ID Card.

The email will also contain links to the following documents, and will ask the candidate to familiarise themselves with the content:

- The School Safeguarding and Welfare Policy
- The School Prevent Duty Policy
- The School Recruitment Policy

See [Appendix 10](#) for a sample invitation to interview.

At interview, candidates are asked about their experience of safeguarding, and The School's commitment to the wellbeing of its students is made clear. Any relevant documents are checked, and copies made as necessary.

Interviews should (where possible) be conducted by 2 members of the school management team. At least 1 of these people should be trained in Safer Recruitment. Before any offer of employment is made, the potential candidate must be interviewed by least 1 of these people should be trained in Safer Recruitment.

3. Pre-Employment Checks

Successful candidates should also be sent electronic copies (or links to electronic copies) of policies and procedures that are of immediate relevance to their role, or which are required by legislation or as a condition of the school's continued accreditation. These are:

- Safeguarding and Welfare Policy
- Prevent Duty Policy
- Health and Safety Policy
- Role-Specific Handbooks

Candidates are also asked to

- provide 2 references, one of whom should be their current or most recent employer
- complete an e-learning module in Basic Safeguarding Awareness E-Learning
- complete an e-learning module in Basic Prevent E-Learning and email their certificates of completion to the school.

See [Appendix 11](#) for a sample conditional offer of employment.

The following checks must be carried out before a new employee starts work:

References

Candidates are asked to provide two referees at interview or upon receipt of a conditional job offer. Ideally, these should include:

- The candidate's current or most recent employer.
Please note that a candidate's current employer must not be approached without the permission of the candidate.
- A recent previous employer in the same field.
- A relevant academic reference, such as CELTA Trainer.
- A supervisor for a voluntary position in a related field.

If the candidate is unable to provide two references from the above list, Burlington School will accept one of the above plus a character reference from a professional known to the candidate, such as a teacher.

The reference request form is based on the job description and person specification, and is emailed to the referees as soon as the conditional offer has been accepted and permission granted to contact the referees. In cases of urgency, the referees may be contacted by telephone, but the call must still be backed up by a written confirmation.

If the referee returns a factual reference, giving only the basic details of employment, the HR representative of The School should follow this up with a telephone call or email requesting further details.

Enhanced DBS Check

The Disclosure and Barring Service (DBS) makes decisions about who will be barred from working with children and vulnerable adults. Regulated activity (i.e. work that a barred person must not do) includes, but is not limited to: ^{xiv}

- unsupervised teaching, training or instruction of children or vulnerable adults.
- unsupervised care or supervision of children or vulnerable adults.
- provision of advice or guidance on well-being to children or vulnerable adults.
- driving a vehicle only for children or vulnerable adults.

As all employees are required to take part in regulated activity, it is Burlington School policy to require applicants to disclose any convictions, cautions, reprimands or final warnings that are not 'protected' as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013) as part of their application. The amendments to the Exceptions Order 1975 (2013) provide that certain spent convictions and cautions are 'protected' and are not subject to disclosure to employers, and cannot be taken into account. Guidance and criteria on the filtering of these cautions and convictions can be found on the Disclosure and Barring Service website^{xv}. **However certain types of posts, particularly those that involve working with children or adults in a vulnerable position or other positions of trust or sensitive areas, are exempt from these provisions, and in these cases all convictions, cautions, reprimands or final warning that will not be filtered in line with the current guidance must be declared.**

Consequently, all staff must undergo an enhanced DBS check before commencement of employment. Staff must be informed of the DBS Update Service^{xvi}, which ensures the DBS Disclosure will be kept up to date, and remove the need for further enhanced checks. Applications for the Update Service must be made within 19 calendar days of the issue of the Disclosure.

If the DBS has not arrived before the planned commencement of employment, the candidate should only start work in cases of extreme operational urgency, and only under the following conditions:

- the potential employee must not engage in regulated activity (they must work under constant supervision and have no access to children).
- the School **must** ensure that the candidate is not on the Barred List (List 99), a list maintained by the DBS of individuals who are barred from working with children.^{xvii}
- a risk assessment **must** be carried out outlining the risks the school has identified, and the measures taken to address these risks. If such measures cannot be taken, the potential employee must not start work until the enhanced DBS check has been returned.

See [Appendix 12](#) for a copy of this risk assessment.

The DBS cannot access criminal records held overseas. Therefore, any applicant who has lived outside the UK for a period of more than 6 months within the last 5 years will be required to submit a police check from the country of residence for that period^{xviii}. If this is not available in English, a certified translation must also be provided.

A 'satisfactory' check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post. Should The School be informed of a previous conviction which does not indicate a direct threat to the safety of the students, Burlington School will interview the staff member to garner more information.

Burlington School will consider any convictions which have been recorded in terms of the following:

- Nature, seriousness and relevance of the offence
- How long ago the offence occurred
- If the offence was a one-off or part of a history
- Circumstances of the offence being committed
- Country of conviction
- Decriminalisation

If the Deputy Principal and School Legal Adviser consider that there is no threat, a rationale will be provided and kept on file stating the reasons.

All staff must report any subsequent criminal convictions to the Deputy Principal. Failure to do so will result in disciplinary action being taken.

Prohibition Order Check

Some individuals may not have broken the law or done anything to appear on the DBS Barred List, but for a number of reasons they may be deemed inappropriate to work with children or young people, and be placed on the Prohibited List for life^{xix}. Since 05 September 2016 it has been a requirement^{xx} that all teaching staff employed since 01 April 2012 must be checked against this list^{xxi}, and against the EEA sanction list to identify individuals sanctioned in other EEA member states by an EEA member state regulator of the teaching profession^{xxii}. In addition to this, Burlington School checks all staff with access to students under the age of 18 against this list, including non-teaching staff, and teaching staff employed prior to 01 April 2012.

Individuals may have Prohibition Orders in place for a number of reasons, including, but not limited to:

- serious departure from the personal and professional conduct elements of the latest teachers' standards, as published by, or on behalf of, the Secretary of State^{xxiii}.
- misconduct seriously affecting the education and/or well-being of pupils, eg failure to report suspicions of abuse.

Disqualification by Association disclosure

The Childcare (Disqualification) Regulations 2009 are made under section 75 of the Childcare Act 2006 and set out the circumstances in which an individual will be disqualified for the purposes of section 75 of the Act^{xxiv}.

Government guidance for Keeping children safe in education^{xxv} states that school staff are potentially disqualified from working in a school, when they “live or work in the same household” as someone who is barred from working with children or young people, even if they would not otherwise be disqualified themselves. It adds that Schools must ensure that they are not knowingly employing a person who is disqualified under the 2009 Regulations in connection with relevant childcare provision.

Disqualification by association only applies to staff working with or managing the education of children up to the age of 5 at any time, or working with or managing the supervision of children up to the age of 8 in relation to activities that take place outside the school day.

Burlington School offers courses for children of 4 years and over. Consequently, staff are asked to provide this information on a self-disclosure form prior to commencement of work. Although the declaration is not mandatory, The School must keep the declaration, whether completed or not, on the employee’s file, and the date of issuing the form must be kept on a central list.

All prospective employees must also complete the following training modules before an unconditional offer is made and a contract issued:

- Accreditation UK Safeguarding Training E-Learning^{xxvi}
- Basic Prevent E-Learning^{xxvii}
- 3 modules from the Anti-Bullying Alliance^{xxviii}:
 - Is it bullying?
 - The 10 key principles
 - Cyberbullying

See the [Burlington School Recruitment, Selection and Retention Policy](#) for further information.

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Training in Safeguarding Under-18s and Vulnerable Adults

- It is compulsory for all staff members to take the E-Learning Introductory Safeguarding Training within one week of acceptance of employment.
- In-house training is provided for all staff as part of their induction. This training must be repeated annually, and should include any relevant updates; the training may also be repeated at other times to reflect changes to legislation.
- All staff members are encouraged to remind themselves of the signs of abuse on a regular basis.
- Burlington School aims to have two Designated Safeguarding Leads, who have received Specialist safeguarding training for designated lead (formerly level 3), one of whom is the Safeguarding and Welfare Officer, and at least 2 additional members of the Safeguarding & Welfare team who have received Advanced Safeguarding for designated staff (formerly level 2)
- If staff members have any questions or worries about the Safeguarding Policy they can speak to the Safeguarding & Welfare Officer or other staff members with Specialist training.

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Establishing a Caring Environment

All staff are responsible for making Burlington School a safe and caring environment for all, including young people and vulnerable adults.

A caring environment is one:

- in which the health, safety and welfare of young people has been assessed and met
- in which staff are aware that abuse can and does happen, and take measures to minimise the risk of it happening.
- where there is a sound and known reporting system for any incident
- where staff take reasonable and practical precautions to avoid any suspicions of abuse being brought against them.

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Child safeguarding Procedures

Where under-18s are concerned there are statutory responsibilities for any organisation to follow regarding the safety of young people. Burlington School has a Safeguarding & Welfare Officer who is responsible for the safeguarding of all students at The School, including under-18s.

- Any concerns regarding the welfare of under-18s must be reported to the Safeguarding & Welfare Officer immediately and the relevant course of action will be taken.
- Any incidents and outcomes will be recorded by the Safeguarding & Welfare Officer in line with the Data Protection Act.
- All staff should be aware of the appropriate responses and actions when a student volunteers information to them. Please see [Appendix 3](#) for advice.
- All staff should be aware that in accordance with statutory requirements where child safeguarding issues are involved, it is not possible to offer confidentiality to a person under 18 as any disclosures must be reported.

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Role of the Designated Safeguarding Leads

The role of the Designated Safeguarding Leads is:

- To monitor and update the Safeguarding Policy and any relevant documents and files.
- To deal with administration where a case is reported to the authorities.
- To support the Safeguarding & Welfare Team in the implementation of the policies.
- To support and advise the Safeguarding & Welfare Team on a day-to-day basis

The Designated Safeguarding Leads should be ready to deputise for one another in the event of absence.

The Designated Safeguarding Leads should be trained to at least Level 3 in Safeguarding.

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Role of the Safeguarding & Welfare Officer

The Safeguarding and Welfare Officer is the primary point of contact for students, and is one of the Designated Safeguarding Leads. The role of the Safeguarding & Welfare Officer is:

- To receive information about events that are planned in Burlington School that may involve young people or vulnerable adults, and plans that indicate how safeguarding will be covered.
- To receive information from any staff, volunteers, children, parents or carers who have child safeguarding concerns and record it.
- To liaise with the Deputy Principal and other Designated Safeguarding Lead over all such concerns.
- To assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate.
- To record statements from any member of staff who feels that a young person has indulged in inappropriate behaviour or made sexually suggestive comments or approaches.
- To record all information in writing in accordance with the Data Protection Act.

In the event of the absence of the Safeguarding and Welfare Officer, the other Designated Safeguarding Lead is expected to deputise.

The Safeguarding & Welfare Officer should be trained to at least Level 3 in Safeguarding and Welfare.

See [Appendix 1](#) for further information.

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Role of the Safeguarding & Welfare Team Members

The Safeguarding and Welfare Team Members are able to take reports from students, staff members and other representatives of the school, such as homestay providers.

- To receive information about events that are planned in Burlington School that may involve young people or vulnerable adults, and plans that indicate how safeguarding will be covered.
- To receive information from any staff, volunteers, children, parents or carers who have child safeguarding concerns and record it.
- To liaise with the Deputy Principal and Designated Safeguarding Leads over all such concerns.
- To record statements from any member of staff who feels that a young person has indulged in inappropriate behaviour or made sexually suggestive comments or approaches.
- To record all information in writing in accordance with the Data Protection Act.
- To pass on all information received to the Designated Safeguarding Leads

The Safeguarding & Welfare Team Members should be trained to at least Level 2 in Safeguarding and Welfare.

See [Appendix 1](#) for further information.

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Vulnerable Adult Procedures

- Before students start at The School any information regarding potential vulnerability should be collected from agents or the individual and Burlington School will put in place any necessary measures to meet their needs.
- Burlington School staff members and their representatives will work together to identify any students they believe to be a vulnerable adult whilst they are studying at The School. If there are any concerns they should contact the Safeguarding & Welfare Officer immediately and the appropriate support measures will be put into place.
- Any special arrangements and concerns will be recorded by the Safeguarding & Welfare Officer in line with the Data Protection Act.

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Reporting and Monitoring Procedures

All members of staff should be aware that they have a responsibility to safeguard children and vulnerable adults. If a concern is raised they should not keep the information to themselves. They should inform the Safeguarding & Welfare Officer immediately to ensure as much information is recorded as possible. Vital information could be missed if this is not done.

- Any concerns about the wellbeing and welfare of a child or vulnerable adult should be reported to the Safeguarding & Welfare Officer.
- It is the duty of staff to inform only, not to investigate - this is the role of the Safeguarding & Welfare Officer and, where appropriate, the Police and Social Services.
- In the event that the Safeguarding & Welfare Officer is not available any concerns should be raised with a member of staff with Specialist Safeguarding training and they will follow the correct procedure for the situation.
- Safeguarding issues will take priority over any other work a person has.
- All concerns will be recorded by the Safeguarding & Welfare Officer and kept in accordance to the Data Protection Act.
- The Safeguarding & Welfare Officer will consult the relevant authorities if they need any advice or support.

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Allegations of Abuse or Inappropriate Behaviour Involving Staff

- Allegations involving any staff member should be reported to the Deputy Principal and the Safeguarding & Welfare Officer instantly. All information will be collected and the relevant procedures will be followed.
- The Safeguarding & Welfare Officer will contact the Local Authority Designated Officer (LADO) who is part of the Local Safeguarding Children Board and follow the advice and suggested actions they provide.
- Whilst a complaint is being investigated the member of staff will be suspended, and if the complaint is upheld the staff member will be dismissed and any relevant authorities informed immediately.
- It should be noted that whilst a young person can consent to sexual activity once they reach the age of 16, the Sexual Offences (Amendment) Act 2000 makes it a criminal offence for a person to engage in any kind of sexual activity with a person under 18 where the adult is in a position of trust.

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Protected Disclosure: “Whistleblowing”

If an employee reports certain types of wrongdoing in the workplace, they are a whistleblower. The wrongdoing disclosed will usually be something they have seen at work, though not always. It must be in the public interest and must affect others, such as the general public. Whistleblowers are protected by law if they report any of the following:

- a criminal offence has been committed.
- you believe someone is covering up wrongdoing.

If you have any concerns, but you are not sure you are protected, you should seek advice from a legal practitioner, a trade union or the Citizens’ Advice Bureau^{xxix}.

What is the Procedure for Whistleblowing?

If you want to raise your concerns, you should speak or write to one of the following:

- The Deputy Principal and/or the Proprietor of Burlington School.
- A Prescribed Person or Body.^{xxx}

If you report your concern to the media, in most cases you will lose your legal rights and protections.

You can raise your concerns anonymously but it may not be taken further if you do not provide all the information that is required. Alternatively, you can give your name but request confidentiality, and the person or body should make every effort to protect your identity.

When you raise your concern:

- Your employer or the Prescribed Person or Body will listen to your concern and decide if any action is needed. You may be asked for further information.
- You must say straight away if you want to request confidentiality.
- You will not have a say in how your concern is dealt with.
- Your employer or the Prescribed Person or Body may keep you informed about the action they take, but will not reveal details that compromise the confidence of other people.

If you report your concerns to The School and are not satisfied with how they have been handled, or if you believe the wrongdoing is still going on you can speak or write to one of the following:

- A Prescribed Person or Body.^{xxxi}
- Acas^{xxxii}.
- The whistleblowing charity Public Concern at Work^{xxxiii}.
- Your trade union.

See the [Burlington School Protected Disclosure \(Whistleblowing\) Policy](#) for further information.

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Media Relations

For any Burlington School activity involving young people, parents or guardians must be given the opportunity to refuse permission for photographs, videos or other images to be made of their children and for the children to be interviewed by press, broadcasters or other media.

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Health and Safety

All staff, students, representatives and sub-contractors of Burlington School must be made aware of Health and Safety requirements and be prepared to abide by them.

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Code of Conduct for Staff

All staff must be familiar with the Burlington School Code of Conduct for Staff (see [Appendix 4](#))

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Code of Behaviour for Young People

All staff must be familiar with the Burlington School Code of Behaviour attached as [Appendix 5](#). Parents/carers of children participating in Burlington School activities must be made aware of the Code of Behaviour.

Posters are displayed throughout the school highlighting the Code of Conduct for students (see [Appendix 6](#)).

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Data Safeguarding

It should be noted that although technically a “child”, consent is still required from young people in the same way as for an adult with regard to matters of data protection.

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Review

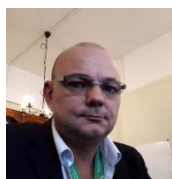
This policy and procedures will be regularly monitored and reviewed:

- In accordance with changes in legislation and guidance on the safeguarding of children and vulnerable adults or any changes within Burlington School
- Following any issues or concerns raised about the safeguarding of children or vulnerable adults within Burlington School
- In all other circumstances, at least annually

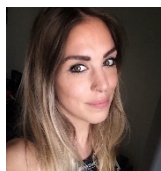
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Appendix 1: Safeguarding Staff

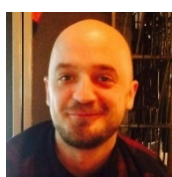
The following are the key Safeguarding staff at Burlington School:



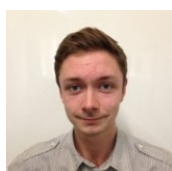
Phil Bloomfield Deputy Principal
Designated Safeguarding Lead
Prevent Lead Person
Specialist safeguarding training for designated lead (formerly level 3)
pbloomfield@burlingtonschool.co.uk



Carla Infurnari Director of Studies
Designated Safeguarding Lead
Safeguarding & Welfare Officer
Specialist safeguarding training for designated lead (formerly level 3)
dos@burlingtonschool.co.uk

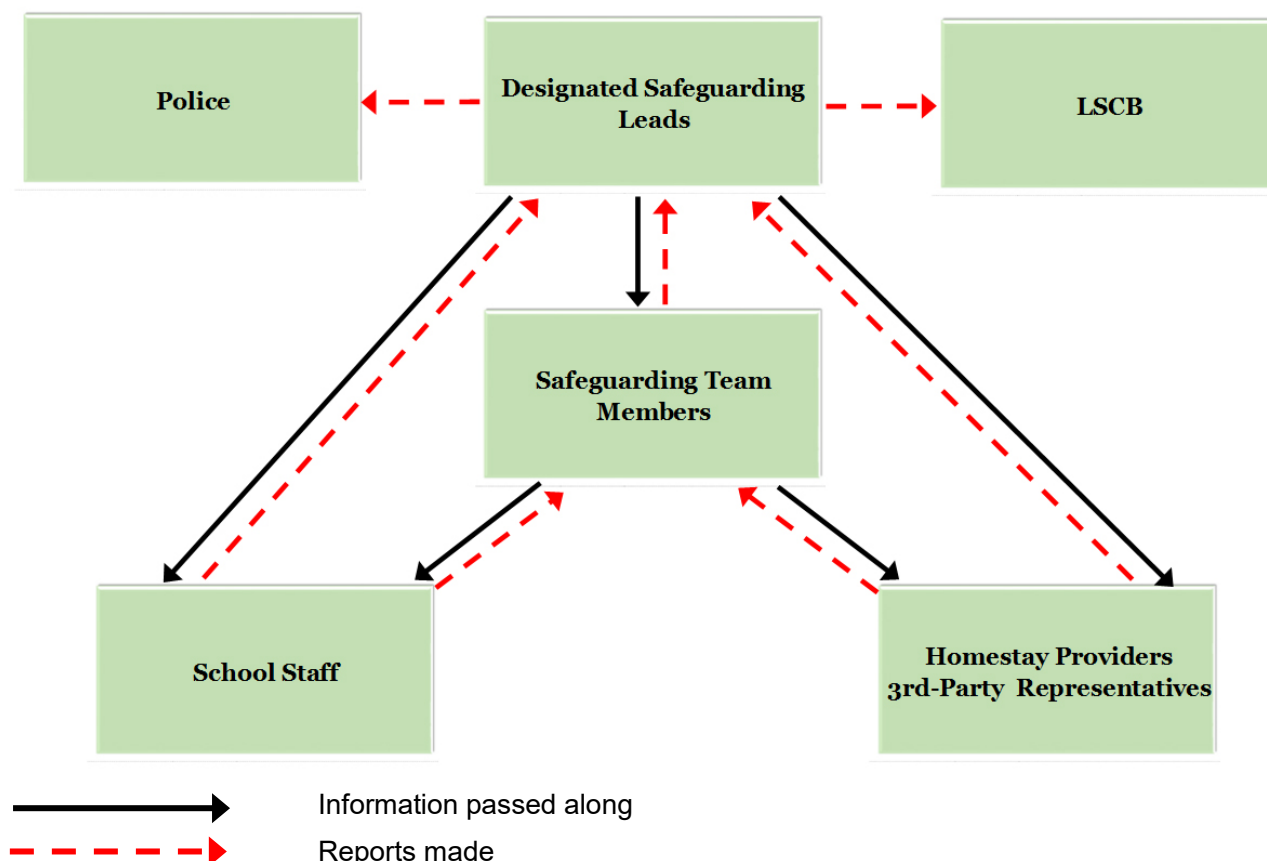


Lee Hall Operations Officer
Safeguarding & Welfare Team Member
Specialist safeguarding training for designated lead (formerly level 3)
sborges@burlingtonschool.co.uk

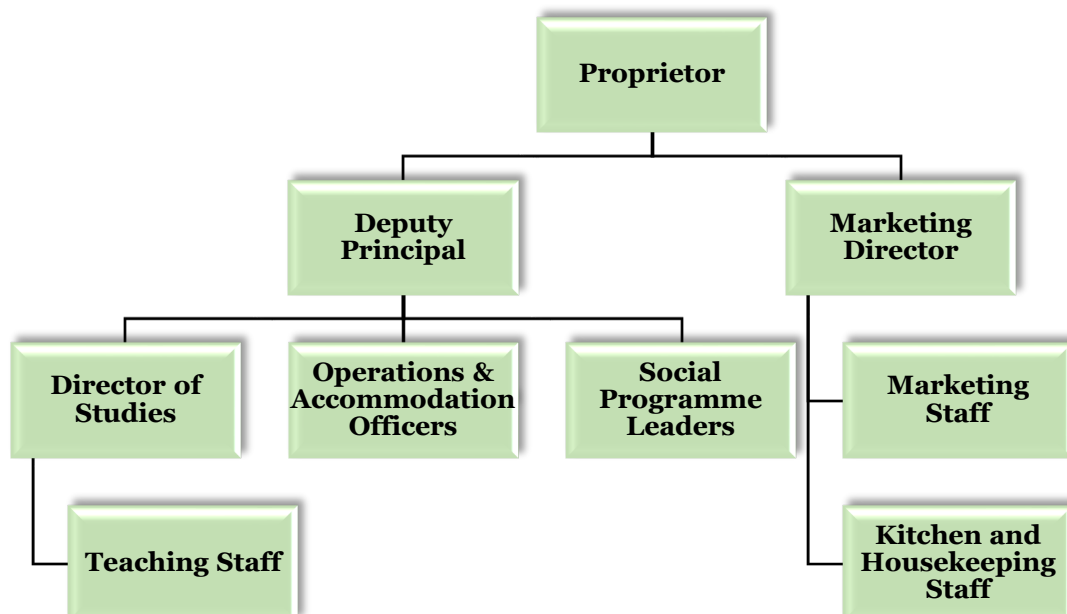


Ed West Accommodation Officer
Safeguarding & Welfare Team Member
Advanced Safeguarding for designated staff (formerly level 2)
ewest@burlingtonschool.co.uk

Reporting Channels for staff:



School staff:



Name	Position	Safeguarding and Welfare Responsibility
Isabella Anders	Proprietor	To oversee the implementation of the policies and procedures relating to Safeguarding and Welfare.
Name	Position	Safeguarding and Welfare Responsibility
Phil Bloomfield	Deputy Principal	Designated Safeguarding Lead Lead Person for Prevent To ensure the policies and procedures relating to Safeguarding and Welfare and the Prevent Duty are adhered to across all departments on a day-to-day basis. To liaise with the other Lead Person over reports of incidents or suspicions. To liaise with the local Safeguarding Children Board and Prevent Engagement Team as required. To report incidents and suspicions to the local Safeguarding Children Board and Prevent Engagement Team and/or the Police as required. To ensure all staff, representatives and sub-contractors are fully trained in their rights and responsibilities relating to Safeguarding and Welfare and the Prevent Duty. To ensure all students are aware of their rights and responsibilities relating to Safeguarding and Welfare and the Prevent Duty. To deal with all cases relating to the Prevent Duty involving individuals under the age of 18.
Carla Infurnari	Director of Studies	Designated Safeguarding Lead Safeguarding & Welfare Officer To receive information about events that are planned in Burlington School that may involve

		<p>young people or vulnerable adults, and plans that indicate how safeguarding will be covered.</p> <p>To receive information from any staff, volunteers, children, parents or carers who have child safeguarding concerns and record it.</p> <p>To liaise with the Deputy Principal and Designated Safeguarding Leads over all such concerns.</p> <p>To assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate.</p> <p>To consult initially with a statutory child safeguarding agency to test out any doubts or uncertainty</p> <p>To make a formal referral to a statutory child safeguarding agency or the police.</p> <p>To record statements from any member of staff who feels that a young person has indulged in inappropriate behaviour or made sexually suggestive comments or approaches.</p> <p>To record all information in writing in accordance with the Data Protection Act.</p> <p>To ensure that all accommodation staff, representatives and subcontractors are fully trained in their rights and responsibilities relating to Safeguarding and Welfare and the Prevent Duty.</p> <p>To ensure that all accommodation staff, representatives and subcontractors are fully compliant with their duties under the Safeguarding and Welfare legislation and Prevent Duty.</p> <p>To offer support and advice to all accommodation staff, representatives and subcontractors as required.</p>
Name	Position	Safeguarding and Welfare Responsibility
Lee Hall	Operations Officer	<p>Safeguarding & Welfare Team Member</p> <p>To receive reports from staff, students and representatives of the school regarding safeguarding and welfare concerns.</p> <p>To pass such concerns on to the Designated Safeguarding Leads.</p> <p>To ensure all accommodation provided falls within legislation and best practice regarding safeguarding and welfare.</p>
Ed West	Accommodation Officer	<p>Safeguarding & Welfare Team Member</p> <p>To receive reports from staff, students and representatives of the school regarding safeguarding and welfare concerns.</p> <p>To pass such concerns on to the Designated Safeguarding Leads.</p> <p>To ensure all accommodation provided falls within legislation and best practice regarding safeguarding and welfare.</p>

Name	Position	Safeguarding and Welfare Responsibility
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Names available on request	Teachers	To be vigilant for and to report to a Lead Person any instances of the signs of concern outlined in Appendix 2 .
Names available on request	Social Programme Coordinator	To be vigilant for and to report to a Lead Person any instances of the signs of concern outlined in Appendix 2 . To pass any concerns on to the Safeguarding and Welfare Team Members and/or the Designated Safeguarding Leads.
Names available on request	Marketing Director	To be vigilant for and to report to a Lead Person any instances of the signs of concern outlined in Appendix 2 . To pass any concerns on to the Safeguarding and Welfare Team Members and/or the Designated Safeguarding Leads.
Names available on request	Marketing Officers	To be vigilant for and to report to a Lead Person any instances of the signs of concern outlined in Appendix 2 . To pass any concerns on to the Safeguarding and Welfare Team Members and/or the Designated Safeguarding Leads.
Names available on request	Housekeeper	To be vigilant for and to report to a Lead Person any instances of the signs of concern outlined in Appendix 2 . To pass any concerns on to the Safeguarding and Welfare Team Members and/or the Designated Safeguarding Leads.
Names available on request	Cook	To be vigilant for and to report to a Lead Person any instances of the signs of concern outlined in Appendix 2 . To pass any concerns on to the Safeguarding and Welfare Team Members and/or the Designated Safeguarding Leads.
Names available on request	Accommodation Providers	To be vigilant for and to report to a Lead Person any instances of the signs of concern outlined in Appendix 2 . To pass any concerns on to the Safeguarding and Welfare Team Members and/or the Designated Safeguarding Leads.

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Appendix 2: Types of Abuse & how to Identify them:

1. Discriminatory Abuse

Discriminatory abuse includes forms of harassment or similar treatment because of:

- Age
- Sex
- Religion
- Disability
- Race
- Sexual orientation
- Gender identity

Discriminatory abuse can take the form of:

- Unequal treatment, including denial or differentiation of resources
- Verbal abuse, inappropriate language, slurs, harassment and deliberate exclusion
- Denial of basic human and civil rights, such as allowing people to follow their own spiritual or cultural beliefs or choice about their own sexuality
- Failure to meet and take into account the religious and cultural needs of an individual
- Racist graffiti or bringing racist material (magazines, leaflets) into the vulnerable individuals home
- Violence

Signs of discriminatory abuse include:

- Tendency to withdrawal and isolation
- Fearfulness and anxiety
- Being refused access to services or being excluded inappropriately
- Loss of self-esteem
- Resistance or refusal to access services that are required to meet need
- Expressions of anger or frustration

Indicators of discriminatory abuse may also take the form of any of indicators of other types of abuse. The difference is that the abuse is motivated by discriminatory attitudes, feelings or behaviour towards an individual.

How is discriminatory abuse relevant to us?

- *Our students may be the target of discriminatory abuse, and we should be extra vigilant to ensure their safety and wellbeing.*
- *It may be the case that our students are the perpetrators of discriminatory abuse, and we should be alert to the way that they talk about and/or treat other students.*

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2. Domestic Abuse

Domestic abuse includes any incident or pattern of incidents of controlling, coercive, violent or threatening behaviour between those aged 16 or over who are or have been, partners or family members. It can take the form of:

- emotional abuse
- physical abuse
- sexual abuse
- financial abuse
- psychological abuse
- so called 'honour' based violence

Signs of domestic abuse include:

- Low self-esteem
- Evidence of physical abuse
- Isolation from friends and family
- Verbal abuse and humiliation in front of others
- Fear of outside intervention
- Limited access to money

How is domestic abuse relevant to us?

- *Different cultures may regard relationships such as marriage or parenthood in a manner not in keeping with the laws and traditions of other countries.*
- *It may be the case that our students are the perpetrators of domestic abuse, and we should be alert to the way that they talk about and/or treat family members and/or partners.*

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3. Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.

Although it is believed by many to be a religious issue, FGM is a cultural practice.

An estimated 200 million girls and women alive today are believed to have been subjected to FGM

It occurs mostly to girls aged from 5 to 8 years old, but is practised on girls up to around 15 years old.

Rates of FGM are increasing.

There are no health benefits to FGM

FGM is predominantly practiced in certain countries in Sub-Saharan Africa.

It is also practised in some countries in Asia, the Middle East, Eastern Europe and South America.

Possible consequences of FGM include:

- | | | |
|---|-----------------------------|----------------------------|
| • Anxiety | • Infertility | • PTSD |
| • Chronic genital infections | • kidney damage and failure | • Severe pain |
| • Chronic reproductive tract infections | • Menstrual problems | • Shock |
| • Depression | • Obstetric complications | • Tetanus |
| • Excessive bleeding | • Possible link to HIV | • Urinary tract infections |
| • Hepatitis (type B and C) | | |

In some cases, death is the result of FGM

Signs a person may be at risk of FGM include:

- Low level of integration into UK society
- A mother or sister, or other relative, who has undergone FGM
- A visiting female elder from the country of origin
- Being taken on a long holiday to the family's country of origin
- Talking about a 'special' event or procedure to 'become a woman'

Signs a person has recently undergone FGM include:

Difficulty walking, standing or sitting

- Spending longer in the toilet
- Appearing withdrawn, anxious or depressed
- Unusual behaviour after an absence from school
- Reluctance to see a doctor
- Asking for help, but without being explicit about the problem due to embarrassment or fear.

It is important that we alert the authorities if we suspect FGM may have already occurred, as it may help them intervene with a younger sibling, relative or member of the victim's community.

How is FGM relevant to us?

- *Our students come from all over the world, including countries where FGM is practiced.*
- *In 2016, over 20 of our students were from countries where FGM is practiced.*

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4. Financial or Material Abuse

Financial or material abuse is the misuse of a person's funds or assets, or obtaining property and funds without the person's knowledge and/or consent. Examples include:

- Theft of money or possessions

- Undue pressure or undue influence put on the person in connection with money or property
- False representation, such as using another person's bank account, cards or documents
- Exploitation of a person's money or assets, such as unauthorised use of a car
- Rogue trading, fraud or scamming

Signs that may indicate financial or material abuse include:

- Missing personal possessions
- Unexplained lack of money
- The person allocated to manage financial affairs is evasive or uncooperative
- Rent arrears and eviction notices
- Disparity between the person's living conditions and their financial resources, such as insufficient food in the house

How is financial or material abuse relevant to us?

- *Students under 18 may have a guardian in the UK who may misuse their money*
- *Students may be prey to fraud from landlords, tradespeople or other trusted individuals*

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5. So-Called Honour-Based Violence

So-called honour-based violence (HBV) is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, HBV might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture
- identify as LGBTQ+
- are disabled
- have previously assisted a victim of HBV

Women and girls are the most common victims of HBV; however, it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault
- murder

A forced marriage is one that is carried out without the consent of both people. This is very different to an arranged marriage, which both people will have agreed to. There is no religion that says it is right to force you into a marriage and you are not betraying your faith by refusing such a marriage.

Signs that somebody may be at risk of or undergoing HBV include:

- | | |
|-----------------------------------|--|
| • Extended absence from school | • Substance abuse. |
| • Decline in academic performance | • Evidence of family disputes |
| • Decline in motivation | • Evidence of domestic violence |
| • Evidence of self-harm, | • Running away from home. |
| • Treatment for depression, | • The student reports they are being emotionally blackmailed |
| • Attempted suicide, | • Relatives making decisions on behalf of the student |
| • Social isolation, | • Older siblings may have a history of forced marriage |
| • Eating disorders | • Substance abuse. |

How is HBV relevant to us?

- *Our students come from all over the world, and from a wide range of cultures, including many from countries and cultures where people are reported to be at a higher risk of HBV^{xxxiv}*
- *Students may have come to the UK to escape a situation such as a forced or arranged marriage, or because they are otherwise at risk of HBV, and they may be at risk of being found.*

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6. Modern Slavery

Slavery did not end with abolition in the 19th century. Slavery continues today in every country in the world, and includes:

- Men, women and children forced into prostitution
- People forced to work in agriculture, restaurants and factories
- People forced into unpaid domestic work
- Children in sweatshops producing goods sold globally
- Entire families forced to work for nothing to pay off generational debts
- Girls married off to older men

Someone is in slavery if they are:

- forced to work – through coercion, or mental or physical threat
- owned or controlled by an 'employer', through mental or physical abuse or the threat of abuse
- dehumanised, treated as a commodity or bought and sold as 'property'
- physically constrained or have restrictions placed on their freedom of movement

Signs that somebody may be in modern slavery include:

- | | |
|--|---|
| • Tendency to withdrawal and isolation | • Absence of legal documents such as passports |
| • No control of (or access to) their own money | • Unwilling or unable to speak for themselves |
| • Old or serious untreated injuries | • Fearful of authority or the authorities |
| • Signs of abuse or torture | • Several unrelated children found at one address |
| • Malnourishment or unkempt appearance | • Frequent change of address |

Human trafficking is a form of modern slavery.

A person is trafficked if they are brought to (or moved around) a country (or between countries) by others who threaten, frighten, hurt and force them to do work or other things they don't want to do.

Facts about slavery

- 20.9 million people are in modern slavery across the world
- 5.5 million children are in slavery across the world
- 1.5 million people are in slavery in developed economies
- 13 thousand slaves in the UK
- 14.2 million slavery victims are exploited in economic activities
- 4.5 million people are in forced into sexual exploitation
- 98% of people trafficked for sexual exploitation are women and girls
- US\$ 150 billion profits forced labour in the private economy generates per year

How is modern slavery relevant to us?

- *Students are often separated from their emotional and financial support networks, and may be prone to being enslaved.*
- *Students may be being brought into the country on student visas specifically to be enslaved, being forced to work in restaurants, construction sites, or in domestic servitude*
- *Students with limited access to money may be coerced into the sex industry*

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7. Neglect

Children suffer from neglect if they are not provided with their essential needs. Types of neglect include:

- Inadequate amount of food, clothing or shelter
- Failure to ensure adequate supervision
- Failure to provide a child with the emotional support they need
- Failure to protect a child from physical harm
- Little or no access to appropriate medical care or treatment

Signs that may indicate neglect include:

- Excessive hunger
- Frequent tiredness
- Poor personal hygiene
- Untreated medical conditions
- Inadequate clothing
- Frequent non- attendance at school
- Low self esteem
- Poor relationships with peers
- Loss of weight or being constantly under weight

How is neglect relevant to us?

- *Students under 18 may be in the care of a guardian in the UK who fails to take proper care of them.*

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8. Physical Abuse

Physical abuse can be defined as any intentional act causing injury or trauma to another person by way of bodily contact. In most cases, children are the victims of physical abuse, but adults can also be victims, as in cases of domestic violence or workplace aggression. It can take the form of:

- Burning
- Poisoning
- Smothering
- Hitting
- Shaking
- Throwing

Physical harm may also be caused when a parent, carer or other adult fabricates or deliberately induces illness in a child.

- Physical signs to look for which might indicate a victim of physical abuse:
- unexplained bruising in well protected areas or soft parts of the body
- bruising in different stages of healing
- unexplained lacerations or abrasions
- untreated medical problems
- unexplained burns in unusual locations
- unexplained fractures to any part of the body
- slap, kick, punch or finger marks
- injury shape similar to an object
- weight loss due to malnutrition or dehydration

Physical abuse can also affect the emotional wellbeing of a person. Signs of this include:

- Depression and Anxiety
- Hiding injuries with clothing
- Aggression and Violence
- Being distant and withdrawn
- Problems with relationships and socialising

How is physical abuse relevant to us?

- *Everybody is at risk of physical abuse.*
- *Students may suffer violent racial or other discriminatory abuse*
- *Students may be more vulnerable due to the language barrier*

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9. Psychological Abuse

Psychological (or emotional) abuse is the severe and persistent ill treatment which adversely affects a child's emotional health and development. Psychological abuse is likely to occur alongside physical abuse, sexual abuse and neglect. It can take the form of:

- threats of harm or abandonment
- deprivation of contact
- humiliation
- blaming
- controlling
- intimidation
- coercion
- harrasment
- verbal abuse
- cyber bullying
- isolation

Psychological abuse can take the form of:

- Humiliating or criticising a child
- Disciplining a child with degrading punishments
- Expecting too much from a child, like pushing them too hard
- Exposing a child to upsetting situations, such as domestic abuse
- Failing to promote a child's social development, such as not encouraging them to make friends
- Constantly ignoring a child, and not giving them the attention they need

Signs that may indicate psychological abuse include:

- Over reaction to mistakes
- Low self esteem
- Sudden speech disorders
- Aggressive behaviour
- Drug, alcohol or solvent abuse
- Awkwardness in social situations
- Excessive need for approval, attention and affection
- Lack of ability to engage in conversations
- Slow progress at school
- Self-isolating behaviour

How is psychological abuse relevant to us?

- *Everybody is at risk of psychological abuse.*
- *Students may suffer racial or other discriminatory abuse*
- *Students may be more vulnerable due to the language barrier*

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10. Sexual Abuse

Child sexual abuse involves forcing or enticing a child or young person to take part in sexual activities or encouraging them to behave in a sexual way. Different types of sexual abuse include:

- Physical contact, including assault by penetration - Including rape and oral sex
- Intentionally engaging in sexual activity in front of a child, or not taking precautions to protect children from being exposed to sexual activity by others.
- Paying for the sexual services of a child or encouraging them into prostitution or pornography.
- Physical contact, including non-penetrative acts - including masturbation, kissing, rubbing and touching outside of clothing.
- Encouraging children to watch or look at pornographic images.
- Meeting a child following sexual 'grooming', or preparation, with the intention of abusing them.
- Encouraging a child to engage in sexual activity of any form.

It is important to remember that sexual abuse is not solely perpetrated by adult males. Women and other children can also commit these offences.

Signs of Sexual abuse include:

- Displays of affection which are sexual and age inappropriate
- Depression and withdrawal
- Incontinence/ Bed wetting
- Alluding to secrets they cannot reveal
- Tendency to need constant reassurance
- Receipt or possession of unexplained gifts or money
- Physical symptoms such as pregnancy

How is sexual abuse relevant to us?

- *Students are often separated from their emotional and financial support networks, and may be prone to entering abusive relationships.*
- *Students may be being brought into the country on student visas specifically to work in the sex industry*
- *Students with limited access to money may be coerced into the sex industry*

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11. Self-Neglect

Self-neglect is any failure of an adult to take care of him or herself that causes, or is reasonably likely to cause, serious physical, mental or emotional harm or substantial damage to or loss of assets. It includes:

- Living in grossly unsanitary conditions
- Suffering from an untreated illness, disease or injury
- Suffering from malnutrition
- Creating a hazardous situation that will cause physical or material harm to themselves or others

Signs of self-neglect include:

- Dehydration or malnutrition
- Inappropriate and/or inadequate clothing
- Untreated medical conditions
- Lack of necessary medical aids, such as glasses
- Poor personal hygiene
- Grossly inadequate housing or homelessness

How is self-neglect relevant to us?

- *One of the underlying causes of self-neglect is depression. Students may feel isolated and depressed while far from home.*
- *Self-neglect can be a symptom of other types of abuse.*

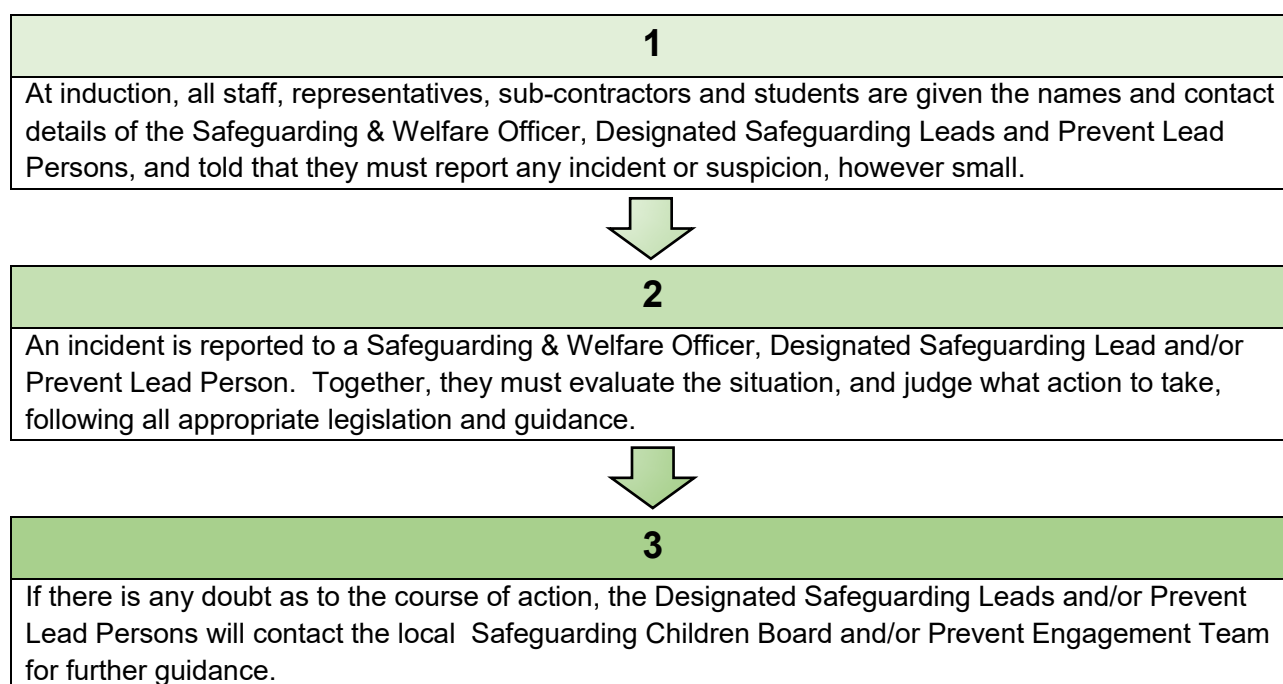
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Appendix 3: Appropriate responses and actions.

The following guidelines are for the use of Burlington School staff and representatives to ensure good practice if an under 18 or vulnerable adult volunteers information about abuse. It will help to protect against false allegations.

- Treat all under-18s and vulnerable adults with the same respect as all other students.
- Ensure that whenever possible there is more than one adult present if you in an area with under-18s or vulnerable adults. Do not spend excessive time alone with them, away from other people.
- Challenge all unacceptable behaviour and report all allegations or suspicions to the Safeguarding & Welfare Officer immediately.
- If you are offered information listen carefully and without judgement, but please exercise caution when discussing sensitive issues.
- If you need to share the information please explain to the student that is what you intend to do.
- Do not promise to keep any of the information a secret.
- Do not promise that you can solve the problem - if the problem persists, you will be seen to have broken the child's trust.
- Reassure the child or vulnerable adult that they have done the right thing in disclosing the information and tell them you believe them.
- Make time for the student to talk to you, do not rush them and do not ask them leading questions, it is not our place to investigate.

How and When to respond:



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Appendix 4: Code of Good Practice for Staff, Students and Volunteers

The following guidelines are intended to be a common sense approach that both reduce opportunities for the abuse of young people and vulnerable adults and help to protect staff, students and volunteers from any false allegation.

You should:

- treat all young people and vulnerable adults with respect and respect their right to personal privacy;
- ensure that, whenever possible, there is more than one adult present during activities or that you are within sight or hearing of others;
- exercise caution when discussing sensitive issues with children or vulnerable adults;
- exercise caution in initiating any physical contact with a young person or vulnerable adults;
- operate within the guidance offered by this Code;
- challenge all unacceptable behaviour and report all allegations or suspicions of abuse;
- avoid becoming personally involved in a student's personal affairs;
- be aware that personal web profiles on social media can be viewed by anyone and therefore should be especially cautious about public web profiles and privacy settings.

You should not:

- establish or seek to establish social contact with under-18s during or after the course;
- give personal email addresses or personal phone numbers to students under 18;
- communicate via email, text, phone, social networking sites, blogs, web pages or messaging services with under-18s;
- post photos or videos of students under 18 on any social networking sites;
- distribute (by any means) images or information about students of any age;
- spend excessive time alone with young people or vulnerable adults away from others;
- take young people or vulnerable adults alone in a car journey, however short;
- take young people or vulnerable adults to your home;
- engage in physical or sexually provocative games including horseplay;
- allow or engage in inappropriate touching of any form;
- make over-familiar or sexually suggestive comments or approaches to a young person or vulnerable adult even as a 'joke';
- let allegations, over familiar or sexually suggestive comments or approaches made by a young person or vulnerable adult go unchallenged or unrecorded;
- do things of a personal nature that young people or vulnerable adults can do for themselves;
- take photographs, videos or other images of a young person without the express permission of their parents.

Under 18s seeking contact with staff:

- If an under 18 seeks to establish social contact, the member of staff must exercise his/her professional judgement and be aware that such social contact could be misconstrued.
- Staff must seek advice from a line manager if students do try to establish contact and copy such communications to the line manager.

Appropriate social contact (electronic or otherwise):

- Staff must maintain neutral, friendly relationships with students while avoiding exclusivity or overfamiliarity.
- Staff must resist any attempt by a student to develop an overfamiliar or exclusive social relationship.
- If a student confides sensitive personal information staff have a duty to listen and respond in a professional manner in accordance with organisational guidelines.

Electronic Contact

- Staff must use only their School email address for any electronic contact with a student before, during or after a course.

- In any electronic contact with students staff must pay particular attention to use neutral, unemotive language that will not be misconstrued.
- Staff must not exchange any information with a student that they would not be happy to share with the child's parent or carer.
- Staff must avoid the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings.
- Staff should be aware that personal information about them may be available in various forms online. Staff should be particularly cautious about their public web profiles and privacy settings.
- Staff should attempt to find ways of setting up and maintaining separate 'personal' and 'professional' electronic profiles.
- Any use of social network sites with under-18s is forbidden.
- Staff must not initiate or agree to 'friendship' requests or similar with students that will result in the sharing of personal information, photos, status updates, etc.

Duty to Report

- Staff have a duty to report to the Safeguarding & Welfare Officer and their Line Manager any actual or perceived inappropriate development of a relationship between a student and staff, electronic or otherwise.
- Any sensitive information communicated by a student to a member of staff, electronic or otherwise, must be reported to the Safeguarding & Welfare Officer and their Line Manager.

Failure to Comply

- Non-compliance with the above policy will result in disciplinary procedures.
- Employers have a duty to remove an individual from regulated activity where there is risk of harm to children.
- Employers have a 'duty to refer' to external authorities* any suspicion or allegation of inappropriate contact by an individual engaged in regulated activity where there is risk of harm to children.

*ISA, police, local child protection authorities

The following is the Code of Conduct as stated in the Employee Handbook:

Core Behaviours and Characteristics

Burlington School has developed a set of Core Behaviours and Characteristics, which illustrate what we hope all our staff to be. It is a person who:

- demonstrates openness and honesty;
- is willing to understand others' points of view;
- treats everyone with respect, trust and dignity;
- is transparent and open in communicating information;
- organises, expresses and communicates ideas clearly, verbally and in writing;
- takes responsibility for their own actions and behaviours whilst working in a team;
- understands the contribution their role makes to the overall success of The School;
- understands how their role and others' work together for the good of The School.

Conduct

The conduct of staff should enhance the reputation of The School at all times.

All staff are expected to:

- behave in a professional manner at all times;
- treat all others equally and fairly in line with our Diversity and Equality Statement^{xxxv};
- behave in ways that respect people's age and background;

All staff are expected **not** to:

- use obscene or offensive language in front of students or colleagues;
- volunteer details of the company or its finances to students;
- ask or volunteer details of private and personal issues to students.

Dress

Appearance is a part of professionalism, and members of staff should dress appropriately to the role they hold.

All staff are expected to:

- dress appropriately for a professional workplace, with no jeans, trainers or old, dirty or damaged clothes
- dress with consideration to others' feelings and cultures.

Media, Social Media and Communications

Communications on behalf of The School should only be made by senior management. Any communications which may jeopardise the reputation of The School will be treated as a disciplinary matter.

Staff are not permitted to:

- make statements to the media as if on behalf of The School: if staff members are asked to make such statements, they should refer the questioner to their line manager;
- use the Burlington School name or brand for personal communication;
- make comments on public fora designed to diminish the reputation of The School, its students or its staff or representatives.

Relationships

For the protection of students and staff, we have guidelines for relationships with students.

All staff are encouraged to:

- maintain separate personal and professional profiles on social media;
- encourage communication through The School rather than personally;
- consider at all times the importance of maintaining trust between staff and students.

All staff are encouraged **not** to:

- mix with students outside the normal school day or Social Programme;
- not to exchange telephone numbers or email addresses with current students;
- not to befriend current students on social media.

Burlington School regards trust and respect between members of staff and student as key to the success of The School. We recognise therefore that any inappropriate relationship between a member of staff and student may seriously damage the educational experience of the student and that of their peers, may generate conflicts of interest, result in inequality of treatment, may damage relationships with other individuals and stakeholders, and may damage the reputation of The School, potentially leading to litigation or prosecution.

In light of this, The School considers it to be a breach of professional ethics for staff members to have romantic or sexual relationships (even if consensual), with a student for whom they have, or are in the future likely to have, responsibility of any kind. You are expected to make serious efforts to prevent any romantic or sexual relationship from occurring with a student. If such a relationship does arise in spite of such serious efforts, you must immediately advise your line manager of the situation so that all responsibilities for the student may be transferred to an alternative member of staff. Similarly, you should not accept responsibility for a student with whom you have had a previous, or have an existing, relationship.

Failure to immediately report any sexual or romantic relationship with your line manager will be deemed a serious breach of Company Policy and will result in disciplinary action being taken.

It is highly inappropriate to form social relationships with students under the age of 18. Doing so is in breach of The School's [Safeguarding and Welfare Policy](#), and will be treated as a disciplinary matter.

Sexual or romantic relationships with students under the age of 18 will result in summary dismissal and the matter being reported to the police and local Safeguarding Children Board

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Appendix 5: Code of Behaviour for Young People & Vulnerable Adults

Burlington School is a language school for the education of students, including children aged under 18. All people visiting Burlington School, either privately or with an organised group, are expected to respect Burlington School, its staff, students and its buildings and grounds.

Burlington School seeks to offer visitors a safe and caring environment. In return, you must:

- respect the rights and dignity of each other and of the staff and other helpers;
- respect the rules of Burlington School.
- Smoking is banned in all buildings at Burlington School and is only allowed within outdoor areas specifically designed for this practice.
- All rules and safety/emergency procedures such as fire drills must be followed.
- Participants in organised events are expected to attend all timetabled activities unless they have been granted specific leave of absence.
- Inappropriate physical intimacy among participants is not permitted.
- Serious incidents of misbehaviour such as fighting, racial/sexual abuse, damage to property, indecent language and failure to obey instructions will normally lead to expulsion from the activity and Burlington School.

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Appendix 6: Student Code of Conduct Poster



Code of Conduct

We want all our students to have a positive and rewarding time in London and at Burlington School. Cases of misconduct are very rare at this school, and we ask all our students to follow this Code of Conduct, which is based on mutual respect and tolerance, and on UK law.

For more information, see the **Student Handbook**.

Punctuality and Attendance

- I will not be late for my classes.
- If I am more than 10 minutes late to class I will not be allowed in.
- I will attend at least 70% of my classes, and I will tell the school if I am ill or on holiday

Classes

- I will buy the coursebook for all of my classes, and bring it to school every day.
- I will speak only English in class.
- I will take part in all activities in class.
- I will only use my mobile phone or tablet in class if my teacher has given me permission, and if it is part of my learning (eg looking up a word in a dictionary).

Respect

- I will treat all students, teachers, and staff and representatives of Burlington School with respect.
- I will not use bad language or abusive language in the school, and I will not make jokes about people's race, religion etc.
- All staff and students at Burlington School are equal. I will not discriminate against anybody based on things like sex, gender identity, sexual orientation, race, religion, nationality, disability or age.

Smoking, Alcohol and Drugs

- In the UK it is illegal to smoke in any public building or enclosed area, including this school.
- I will not drink or bring alcohol in the school, or in the school residence.
- I will not use or bring illegal drugs in the school.

Health and Safety

- I will think about my own and other people's health and safety at all times.
- I will not interfere with or damage any fire equipment in the school.
- I will not enter areas of the school that are private or off-limits.
- It is illegal to carry weapons such as guns and knives in the UK. Any students carrying weapons will be excluded from the school and reported to the police.

Appendix 7 Burlington School Statement of Aspiration: The Prevent Duty

Burlington School Statement of Aspiration: The Prevent Duty

Under our responsibility to the Prevent Duty, Burlington School and its staff, representatives and subcontractors aspire to:

- **promote** a safe and supportive international environment with clear and explicit expectations of acceptable behaviour, such as respect, tolerance and non-discrimination.
- **promote** a safe and supportive international environment with clear and explicit expectations of unacceptable behaviour, such as discrimination, expression of extremist views or bullying.
- **promote** Core British Values at all times within the school, by
 - **conducting** ourselves professionally at all times and leading by example.
 - **promoting** the values with notices throughout the school.
 - **incorporating** British culture and values into our teaching.
 - **encouraging** an atmosphere of respect and understanding.
- encouraging** students to engage with democracy through the student council.
- **challenge** radical or extremist views in any context in an appropriate way, countering arguments with Core British Values.
- **protect** our students, staff and representatives by filtering IT equipment and internet access, with clear rules on accessing extremist or terrorist websites and use of social media to exchange extremist views or material.
- **protect** our students, staff and representatives by monitoring noticeboards and leaflets in the school to ensure there is no material promoting extremist or terrorist thinking.
- **protect** our students, staff and representatives by checking representatives and sub-contractors to ensure that no extremist speakers or organisations use the school to distribute material or expound their views.
- **develop** critical awareness and thinking among students, staff and representatives to counter extremist beliefs, especially those expressed online.
- **take an interest** in students' background, home circumstances and friendship groups, as such interest will make it easier to spot changes in behaviour.
- **support** any students identified as vulnerable.
- **be vigilant** in noticing any signs of radical or extremist behaviour, and reporting such concerns to a Prevent Lead Person immediately.
- **be ready** to react when world or local events cause upset and the likelihood of conflicting feelings being expressed.

The Prevent Lead Person at Burlington School is:



Phil Bloomfield

Deputy Principal

pbloomfield@burlingtonschool.co.uk

Tel: 020 7736 9621

- Designated Safeguarding Lead
- Prevent Lead Person

Further information can be found in our Prevent Duty Policy or by visiting

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

Appendix 8: Key Safeguarding Contacts

Burlington School

Name	Position	Contact
Phil Bloomfield	Designated Safeguarding Lead Prevent Lead Person	Tel: 020 7736 9621 Mobile: 07858 625673 Email: pbloomfield@burlingtonschool.co.uk
Carla Infurnari	Designated Safeguarding Lead Safeguarding & Welfare Officer	Tel: 020 7736 9621 Mobile: 07377 449536 Email: dos@burlingtonschool.co.uk
Lee Hall	Safeguarding Team Member	Tel: 020 7736 9621 Email: operations@burlingtonschool.co.uk
Ed West	Safeguarding Team Member	Tel: 020 7736 9621 Email: accommodation@burlingtonschool.co.uk

Wandsworth Borough Local Safeguarding Children Board

School and accommodation in Balham, Wandsworth, Tooting, East/West Putney, Southfields

Agency	Contact
Wandsworth Multi-Agency Safeguarding Hub (MASH)	Tel: 0208 871 6622 Out-of-Hours: 020 8871 6000 Email: mash@wandsworth.gov.uk https://www.wandsworth.gov.uk/health-and-social-care/children-and-families/report-a-concern-about-a-child/
Wandsworth Safeguarding Children and Young People Board	Tel: 020 8871 7401 Email: wscb@wandsworth.gov.uk http://www.wscb.org.uk/

Lambeth Borough Local Safeguarding Children Board

Accommodation in Streatham, Clapham, Brixton, Stockwell

Agency	Contact
Lambeth Safeguarding Children Partnership	Tel: 020 7926 5555 Email: dutymanager@lambeth.gov.uk https://www.lambethsafeguarding.org.uk/

London Borough of Hammersmith and Fulham Local Safeguarding Children Board

Accommodation in Hammersmith, Fulham, Parsons Green and Shepherds Bush

Agency	Contact
Hammersmith & Fulham LSCB	Tel: 020 8753 6600 Email: familyservices@lbhf.gov.uk https://www.rbkc.gov.uk/lscb/

London Borough of Kingston Local Safeguarding Children Board

Accommodation in New Malden and Tolworth

Agency	Contact
Kingston Single Point of Access (SPA)	Tel: 020 8547 5008 Out-of-Hours: 020 8770 5000 Email: lscb-support@kingrichlscb.org.uk https://kingstonandrighmondssafeguardingchildrenpartnership.org.uk

London Borough of Merton Local Safeguarding Children Board

Accommodation in Wimbledon, Merton and Morden

Agency	Contact
Merton Safeguarding Children Partnership:	Tel: 020 8545 4226 Email: mash@merton.gov.uk https://www.mertonscp.org.uk/

Local Safeguarding Children Boards (Other Boroughs)

Organisation	Contact
London Safeguarding Children Board	See http://www.londonscb.gov.uk/contacts/referrals.html for telephone of individual borough safeguarding boards.

Wandsworth Borough Prevent Engagement Team

Organisation	Contact
Wandsworth Multi-Agency Safeguarding Hub (MASH)	Email: mash@wandsworth.gov.uk Tel: 0208 871 6622 Out-of-Hours: 020 8871 6000

Emergency Services

Situation	Contact
Non-Emergency Situations	Tel: 101
Emergency Situations	Tel: 999

English UK

Name	Position	Contact
Huan Japes	Deputy Chief Executive (Professional Services)	Email: huan@englishuk.com Tel: 020 7608 7967

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Appendix 9: Sample Job Advert

Job Title	Business Development Manager
Company Name	Burlington School
Responsible to	Marketing Director
Responsible for	Marketing and Sales Officers (2 - 3)
Location	London, United Kingdom
Job Type	Permanent
Salary	£25000 - £35000 (depending on skills and experience) + bonus structure
Language skills required	Native Speaker or C2 Level of English

Description

Burlington School is recruiting a Business Development Manager to join the senior management team to help develop the business, and to consolidate and enhance the company's brand and market share.

Burlington School is an independent English Language School based in the Parsons Green area of London. The school was established in 1990, and we are looking to develop and diversify our products in line with current and future markets.

Reporting to the Marketing Director, The Business Development Manager will have primary responsibility for B2B and other sales channels, and will be responsible for devising marketing strategies and sales targets, and ensuring they are met. The Business Development Manager will also have a key role in development, including:

- establishing and developing relationships with educational and corporate institutions, both in the UK and worldwide;
- developing products in conjunction with the Academic team tailored to specific markets;
- raising the school's profile in current and emerging markets.

The successful candidate will be able to work on his or her own initiative but also as part of a team, and will have a thorough understanding of the language education industry.

Principal Responsibilities:

- To devise and manage short and medium-term marketing and sales strategies
- To ensure existing B2B sales channels are being utilised to their best advantage
- To work with the Marketing Director to position the school's products in the current marketplace
- To work with the Marketing Director to ensure the school is proactive in preparing for future market developments
- To assist in development of products for new and existing markets
- To be responsible for developing relationships with organisations in the UK and overseas increase the uptake of Burlington School courses, including:
 - ETOs;
 - Educational Institutions;
 - Companies and Corporations
- To line manage the Marketing and Sales team in relation to the above
- To assist the Marketing Manager with any other duties within the scope, spirit and purpose of the job

Safeguarding Responsibilities

Burlington School is committed to safeguarding and promoting the welfare of its students, and expects all stakeholders to share this commitment. All stakeholders must be aware of their responsibilities under legislation regarding Safeguarding, Health and Safety, and the Prevent Duty.

It is the responsibility of all staff to promote the safeguarding the welfare of children and young persons for whom they are responsible, or with whom they come into contact. All staff must adhere to and ensure compliance with the school's Safeguarding and Welfare Policy, and the Staff Code of Conduct at all times.

If, in the course of carrying out your duties, you become aware of any actual or potential risks to the safety or welfare of children in the school you must report any concerns to the school's Designated Safeguarding Lead.

Candidate Specification:

Required

- First Degree, ideally in a business-related field
- Thorough understanding of the language education industry
- Proven B2B sales experience
- Previous management experience
- Outstanding customer focus
- Excellent interpersonal skills

Desirable

- Management qualification
- Understanding of the Tour Operator industry
- Written and spoken proficiency in language(s) other than English
- Current clear Enhanced DBS disclosure (please note: this will be required before commencement of employment)

Burlington School is an equal opportunity employer and is determined to ensure that no applicant or employee receives less favourable treatment on the grounds of gender, age, disability, religion, belief, sexual orientation, marital status, or race.

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Appendix 10: Sample Invitation to Interview

Dear ,

Further to your application for the role of Business Development Manager at Burlington School, I would like to invite you for an interview.

The interview will be at **10:30** on **Thursday 28 January 2016**. The interview will be at:
Burlington School
Lord Annaly House
146A Bedford Hill
London
SW12 9HW
United Kingdom

The nearest underground station is **Balham** on the **Northern Line**; the nearest national rail station is **Balham**. [Click here](#) for further information on how to find us.

Upon arrival, please ask at Reception for George Barnbrooke, Marketing Manager, who will be conducting the interview, along with Phil Bloomfield, Deputy Principal.

If this time is unsuitable for you, please let George Barnbrooke know as soon as possible, either by email at marketing@burlingtonschool.co.uk or telephone on 020 7736 9621, and we will arrange an alternative appointment.

The interview will last approximately 1 hour, and will be in 2 stages:

- There will be an interview exploring your experience, skills and future plans;
- Please prepare a short presentation (approximately 5 minutes) outlining a method for introducing Burlington School to The Middle East, a new market for the school. A laptop and projector will be available on the day of your interview. Please email a copy of the presentation to marketing@burlingtonschool.co.uk before 12 noon on Wednesday 27 January 2016.

On the day of your interview, please bring proof that you are entitled to work in the EU, such as a passport, and originals of any academic qualifications.

You may find it helpful to view our website <http://burlingtonschool.co.uk/> before the interview, but we would ask you to familiarise yourself with the following school policies:

- the school Safeguarding and Welfare Policy
- the school Prevent Duty Policy
- the school Equal Opportunities Statement

You can view these at <http://burlingtonschool.co.uk/downloads>

If you have any questions, please do not hesitate to contact me, and I look forward to meeting you.

Yours sincerely,

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Appendix 11: Sample Conditional Offer of Employment

Dear ,

Thank you for coming in for an interview on Thursday 28 January. I am pleased to offer you the position of Business Development Manager at Burlington School.

The details of the job are as follows:


Job title	Business Development Manager
Job outline	<ul style="list-style-type: none"> To devise and manage short and medium-term marketing and sales strategies To ensure existing B2B sales channels are being utilised to their best advantage To work with the Marketing Director to position the school's products in the current marketplace To assist in development of products for new and existing markets To line manage the Marketing and Sales team in relation to the above To assist the Marketing Manager with any other duties within the scope, spirit and purpose of the job
Responsible to	Marketing Director
Responsible for	Marketing and Sales Officers (2 - 3)
Location of the main place of work	Burlington School Lord Annaly House 146A Bedford Hill London SW12 9HW
Start date	Monday 01 March 2016
Hours of Work	09:00 - 18:00
Induction period	1 week
Probationary period	6 months
Conditions which need to be met	<ul style="list-style-type: none"> Satisfactory references Enhanced DBS check
Terms	<ul style="list-style-type: none"> £28000 pa, to be paid in arrears on the 5th working day of the following month 20 days holiday pa, + bank holidays Automatic enrolment into Workplace Pension scheme (see https://www.gov.uk/workplace-pensions/about-workplace-pensions for further information)
What you need to do	<ul style="list-style-type: none"> Please provide 2 references, one of whom should be your current or most recent employer Please complete the following e-learning modules, and email your Certificates of Completion to the school <ul style="list-style-type: none"> An Awareness of Child Abuse and Neglect http://www.courses.kirkleessafeguardingchildren.co.uk/ Anti-Bullying Alliance: Module 1 - Is it bullying? Module 4 - The 10 key principles to reduce bullying of disabled learners and learners Module 7 - Cyberbullying https://www.anti-bullyingalliance.org.uk/training-catalogue Prevent for practitioners https://www.foundationonline.org.uk/

I have attached a document giving directions and further information on these modules.

Please let me know if you have any further questions, and we look forward to working with you.

Best wishes,

Appendix 12: HR Checklist and Risk Assessment for Potential Employees Awaiting a DBS Check



Burlington School
excellence in English

Lord Annaly House
146A Bedford Hill
London
SW12 9HW
United Kingdom

Starter Checklist

To be completed for all new employees **prior to** commencement of employment.

Please refer to the sections *Pre-Employment Checks and Induction* in the school's **Recruitment, Selection and Employment Policy**, and the section *Pre-Employment Checks* in the school's **Safeguarding Children and Vulnerable Adults Policy**

Recruitment Documents

1	CV*	<input type="checkbox"/>	_____
2	Signed Contract*	<input type="checkbox"/>	_____
3	Copy of Job Advertisement*	<input type="checkbox"/>	_____
4	Induction Checklist*	<input type="checkbox"/>	_____

Background Checks and Safeguarding

1	Reference 1*	<input type="checkbox"/>	Notes _____ _____ _____
2	Reference 2*	<input type="checkbox"/>	
3	DBS Check***	<input type="checkbox"/>	
4	Overseas Police Check(s)***	Yes <input type="checkbox"/> N/A <input type="checkbox"/>	
Please specify countries _____			
6	List 99/Barred List Check***	<input type="checkbox"/>	_____
7	Safeguarding Certificate*	<input type="checkbox"/>	_____
8	Prevent Certificate*	<input type="checkbox"/>	_____
9	Anti-Bullying Certificates	<input type="checkbox"/>	_____
12	Staff Suitability Declaration*	<input type="checkbox"/>	_____

Academic/Vocational Qualifications


1	1 st Degree**	Yes <input type="checkbox"/> N/A <input type="checkbox"/>	Notes _____ _____ _____
2	2 nd Degree**	Yes <input type="checkbox"/> N/A <input type="checkbox"/>	
3	TEFL1**	Yes <input type="checkbox"/> N/A <input type="checkbox"/>	
4	TEFL2**	Yes <input type="checkbox"/> N/A <input type="checkbox"/>	
5	Other	Yes <input type="checkbox"/> N/A <input type="checkbox"/>	
Please specify _____			


Employee Details


1	Staff Details*	<input type="checkbox"/>	Notes _____ _____ _____
2	Passport**	<input type="checkbox"/>	
3	Proof of right to work in UK**	<input type="checkbox"/>	
4	Starter Checklist/P45	<input type="checkbox"/>	


* Documents to be kept on file
 ** Copies of documents to be kept on file: the line manager/HR manager must sign these copies and include the words "Original seen [date]"
 *** If "No" is selected, complete the *Risk Assessment for potential employees awaiting a DBS check*


www.burlingtonschool.co.uk
info@burlingtonschool.co.uk
 +44 (0) 20 7736 9621











Burlington School
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Lord Annaly House
146A Bedford Hill
London
SW12 9HW
United Kingdom


Pre-Work Checklist - potential employee awaiting a DBS check


The following checks must be carried out prior to commencement of employment. In order to minimise any potential risk, the following questions must all be answered "yes"; if any questions are answered as "no", employment must not commence until a clear Enhanced DBS check has been returned.


1	Has the List 99 check come back as clear?	Yes <input type="checkbox"/>	Go to condition 2
		No <input type="checkbox"/>	Employment must not commence.
<hr/>			
2	Have 2 satisfactory references been returned?	Yes <input type="checkbox"/>	Go to condition 3
		No <input type="checkbox"/>	Employment must not commence.
<hr/>			
3	Have the above references been verified by telephone, paying particular attention to the question <i>Do you know of any reason the candidate should not work with young children or vulnerable adults?</i>	Yes <input type="checkbox"/>	Go to condition 4
		No <input type="checkbox"/>	Employment must not commence.
<hr/>			
4	Can any gaps on the CV of 3 months or more be accounted for, and have such reasons been verified?	Yes <input type="checkbox"/>	Go to condition 5
		No <input type="checkbox"/>	Employment must not commence.
<hr/>			
5	Has the staff suitability declaration been returned?	Yes <input type="checkbox"/>	Go to risk assessment
		No <input type="checkbox"/>	Employment must not commence.
<hr/>			

www.burlingtonschool.co.uk
info@burlingtonschool.co.uk
 +44 (0) 20 7736 9621









Risk Assessment - potential employee awaiting a DBS check

The following measures have been developed to minimise the risks associated with a new employee commencing work before a DBS check has been returned. The questions must all be answered "yes"; if any questions are answered as "no", employment must not commence until a clear Enhanced DBS check has been returned.

The assumption is that all contact of the potential employee with children is potentially catastrophic (the highest category of severity of harm), and this cannot be changed. The following measures are designed solely to minimise the probability of this harm occurring on a temporary basis, and should not be regarded as a long-term solution.

- | | | | |
|---|---|---|---|
| 1 | Is a member of the safeguarding team available to be present at all times when the potential employee has actual or potential contact with children, overseeing all interactions with children (such as in class or on lunch duty)? | Yes <input type="checkbox"/>
No <input type="checkbox"/> | Go to question 2
Employment must not commence. |
| 2 | Is a member of the safeguarding team available to be present at all times when the potential employee has actual or potential contact with adults who have a supervisory role with children, such as group leaders or homestay providers? | Yes <input type="checkbox"/>
No <input type="checkbox"/> | Go to question 3
Employment must not commence. |
| | Have measures been taken to ensure that the potential employee has actual or potential contact with children during breaks (such as separate toilets, ensuring breaks for children are monitored and supervised) | Yes <input type="checkbox"/>
No <input type="checkbox"/> | Go to question 4
Employment must not commence. |
| 4 | Have measures been taken to ensure the potential employee cannot access student records (Are all printed records kept in a locked cupboard? Does the potential employee have no access to the student database? Are all passwords secure and secret?) | Yes <input type="checkbox"/>
No <input type="checkbox"/> | Go to question 5
Employment must not commence. |

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|---|---|---|--|
| 5 | Have measures been taken to ensure the potential employee has no opportunity to give guidance or advice to children (such as syllabus design, social programme planning or web content creation)? | Yes <input type="checkbox"/>
No <input type="checkbox"/> | Go to question 6
Employment must not commence. |
| 6 | Have measures been taken to ensure the potential employee has no opportunity to communicate with children by telephone, internet or other electronic means (such as no external email access, no telephone/reception duties)? | Yes <input type="checkbox"/>
No <input type="checkbox"/> | Go to question 7
Employment must not commence. |
| 7 | Is there a genuine urgent operational need for the potential employee to start work (such as emergency replacement for a teacher)? | Yes <input type="checkbox"/>
No <input type="checkbox"/> | Employment may commence
Employment must not commence. |

To be signed by a Designated Safeguarding Lead:

Signed: _____

Name _____

Date: _____

Appendix 13: References

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- i <http://www.legislation.gov.uk/ukpga/2002/32/section/175>
 - ii <http://www.legislation.gov.uk/ukpga/1989/41/contents>
 - iii <http://www.legislation.gov.uk/ukpga/2004/31/contents>
 - iv <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
 - v <http://www.legislation.gov.uk/ukpga/2006/47/section/59>
 - vi <http://www.legislation.gov.uk/ukpga/1998/29/contents>
 - vii <http://www.legislation.gov.uk/ukpga/1997/50/contents>
 - viii <http://www.legislation.gov.uk/ukpga/2015/6/contents/enacted>
 - ix https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf
 - x <https://www.gov.uk/government/publications/counter-terrorism-strategy-contest>
 - xi https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf
 - xii https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/278849/Safeguarding_Children_and_Young_People_from_Sexual_Exploitation.pdf
 - xiii http://wnc.equalities.gov.uk/publications/cat_view/143-policy-documents/90-violence-against-women.html
 - xiv https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/316179/Regulated_Activity_in_relation_to_Children_DfE_.pdf
 - xv <https://www.gov.uk/government/publications/dbs-filtering-guidance/dbs-filtering-guide>
 - xvi <https://www.gov.uk/dbs-update-service>
 - xvii <https://www.gov.uk/guidance/teacher-status-checks-information-for-employers>
 - xviii <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>
 - xix https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224727/Teacher_misconduct_the_prohibition_of_teachers.pdf
 - xx <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
 - xxi Accessed via employer.access@education.gsi.gov.uk
 - xxii <https://www.gov.uk/guidance/teacher-status-checks-information-for-employers>
 - xxiii https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/301107/Teachers_Standards.pdf
 - xxiv <http://www.legislation.gov.uk/uksi/2009/1547/contents/made>
 - xxv <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

xxvi <https://accreditation-uk.english.britishcouncil.org/>

xxvii <https://www.foundationonline.org.uk/>

xxviii <https://www.anti-bullyingalliance.org.uk/training-catalogue>

xxix <https://www.citizensadvice.org.uk/>

xxx https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496899/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf

xxxi https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496899/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf

xxxii <http://www.acas.org.uk/index.aspx?articleid=1410>

xxxiii <http://www.pcaw.org.uk/contact-us>

xxxiv <http://www.domesticviolencelondon.nhs.uk/1-what-is-domestic-violence-/17-honour-based-violence.html>

xxxv See Burlington School Employee Handbook



Burlington School

Excellence in English

Burlington School

Lord Annaly House, 146A Bedford Hill

London, SW12 9HW, UK

t: +44 (0) 20 7736 9621 +44 (0) 20 7610 9662

f: +44 (0) 20 7371 8131

info@burlingtonschool.co.uk

www.burlingtonschool.co.uk